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March 26, 2025

The Honorable Jennifer H. Rearden  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

*Re: United States v. Edwin Pagan III and David Macey, 24-cr-641 (S.D.N.Y.)*

Dear Judge Rearden:

We write to request an adjournment of today's conference and to ask the Court for a briefing schedule on defendants' planned motion for transfer of venue to the Southern District of Florida under Federal Rule of Criminal Procedure 21(b), set a schedule for pretrial motions, and set a new trial date in this case. The parties discussed scheduling earlier this week and have agreed to the following dates, if the Court is amenable:

For the venue transfer motion, defendants shall file on or before March 31. The government shall file its response on or before April 21, and defendants shall file their reply on or before April 28. The parties have agreed to this separate, expedited briefing on the venue transfer motion so that the issue may be resolved before the Court engages with other substantive issues.

For other pretrial motions, defendants shall file on or before June 20. The government shall file its response on or before July 11, and defendants shall file their replies on or before July 21.

As to the trial date, the parties request a short adjournment to mid-October, on a date that is convenient to the Court, to allow for adequate preparation and accommodate defense counsels' other trial dates.

Lastly, the parties suggest that the Court set a status conference sometime shortly after the venue transfer briefing is complete. The parties are happy to contact chambers to find a suitable date.

The parties also agree to exclude time under the Speedy Trial Act until the next conference to allow counsel time to engage in motions practice, review discovery and prepare for trial. The parties agree that exclusion of time would serve the interests of justice.

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Respectfully submitted,



David Patton

cc: Chris DeCoste, Esq.  
Emily Deininger, AUSA  
Matthew Andrews, AUSA